

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

GLOBAL WEATHER PRODUCTIONS, LLC

Plaintiff,

v.

JOE PAGS MEDIA, LLC

Defendant.

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Case No: 5:23-cv-01350-JKP-ESC

**APPLICATION IN SUPPORT OF PLAINTIFF’S
REQUEST FOR ENTRY OF DEFAULT PURSUANT TO FED.R.CIV. 55(a)**

I, JAMES H. FREEMAN, declare under the penalty of perjury that the following is true and correct to the best of my personal knowledge.

1. I am counsel for Plaintiff Global Weather Productions, LLC (“Plaintiff”).
2. I submit this Declaration in support of Plaintiff’s request for the Clerk’s entry of default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure. Fed.R.Civ.P. 55(a).
3. Defendant Joe Pags Media, LLC (“Defendant”) is not an infant, in the military or an incompetent person.
4. Defendant’s answer or response to the Complaint was due on February 8, 2024.
5. Defendant has failed to plead or otherwise defend the action.
6. As per the Affidavit of Service, filed on January 19, 2024 [Docket No. 7], the pleading to which no response has been made was properly served.

Dated: March 5, 2024

Uniondale, New York

/s/jameshfreeman/
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served via CM/ECF on March 5, 2024 on all counsel of record.

/s/ James H .Freeman /
James H. Freeman